

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the October 1, 2002 Statement of Legal and Factual Basis

R. R. Donnelley
Lynchburg, Virginia
Permit No. SCRO30124

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, R. R. Donnelley Printing Company has applied for a Title V Operating Permit for its Lynchburg, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____

Date:

Air Permit Manager:_____

Date:

Regional Director:_____

Date:

FACILITY INFORMATION

Permittee

R. R. Donnelley Printing Company
4204 Murray Place
Lynchburg, VA 24501-5099

Facility

R. R. Donnelley Printing Company
4204 Murray Place
Lynchburg, VA 24501-5099

AIRS ID No. 51-680-0032

SOURCE DESCRIPTION

SIC Code: 2754 - commercial publication rotogravure printer

PERMIT AMENDMENT INFORMATION

This amendment is being generated to incorporate the equipment to be installed per a PSD permit amendment that was issued on May 14, 2004

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on September 30, 2003. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The following emissions unit to be added at this facility consists of the following :

One hard chromium plating system (CP-1b) with a rectifier capacity of 15, 000 amperes for plating gravure cylinders (MACT Subpart N). The unit will be controlled by a composite mesh-pad system. Stack ID. DM1. Note: CP-1a hard chrome plating system will be removed prior to startup of CP-1b.

EMISSION UNIT APPLICABLE REQUIREMENTS - Boiler B1, Boilers B2, and B3

Conditions III. and IV. The reference condition number and permit date are changed to the current permit date.

EMISSION UNIT APPLICABLE REQUIREMENTS - #503, #504, #505, #506, #507, #508, #509, #510, #511, #601 proof press, and WT-1, WT-2, and WT-3 wash tanks

Another reason for issuing the NSR permit dated May 14, 2004 was to extend the construction date for Presses #510 and #511 and to tie the two solvent recovery units (SR#2 and SR#3) into one system (SR#2-3)

Limitations

Condition V.A.1. This condition specifies the modified control system for #503, #504, #505, #506, #507, #508, #509, #510, #511, #601 proof press, and WT-1, WT-2, and WT-3 wash tanks.

Condition V.A.2 from the original Title V permit has been removed since all presses are included in this condition. Additionally, presses #508, # 509, #510, and #511 shall be installed within a permanent total enclosure.

Condition V.A.2. and 3. The reference condition number and permit date are changed to the current permit date.

Conditions V.A.4., 5., 6., 7., 8., and 9. Limits have been changed to match the conditions on the NSR permit to reflect the combined solvent recovery system. Also, the reference condition number and

permit date are changed to the current permit date.

Condition V.A.10. The reference condition number and permit date are changed to the current permit date.

Conditions V.A.11., 12., 13., and 15. The reference condition number and permit date are changed to the current permit date.

Condition V.A.14. This condition states the MACT control level.

Condition V.A.16. This condition allows the extension for construction of press #510 and #511 to March 23, 2005. Also, the reference condition number and permit date are changed to the current permit date.

Monitoring

Condition V.B.1. This condition is changed to state the combined solvent recovery system. Also, the reference condition number and permit date are changed to the current permit date.

Conditions V.B.2. and 3. These conditions state the MACT requirements.

Recordkeeping

Condition V.C. This condition states the new recordkeeping, based on the combined solvent recovery system. Also, the reference condition number and permit date are changed to the current permit date.

Testing

Conditions V.D.1. and 2. The reference condition number and permit date are changed to the current permit date in these two conditions.

Reporting

Condition V.E.1. This condition is changed to include the combined solvent recovery system. Also, the reference condition number and permit date are changed to the current permit date.

Condition V.E.2. The reference condition number and permit date are changed to the current permit

date.

Condition V.E.3. This condition states the MACT requirements.

Condition V.E.4. The reference condition number and permit date are changed to the current permit date.

EMISSION UNIT APPLICABLE REQUIREMENTS - Chromium Electroplating lines (CP-1a, CP-1b, and CP-2

Limitations

Condition VI.A.1. This condition states the control device for plating tanks CP-1a and CP-1b. Note: CP-1a will be removed prior to startup of CP-1b.

Condition VI.A.2. This condition states the control system for CP-2. The reference condition number and permit date are changed to the current permit date.

Condition VI.A.3. This condition states the emission limits for the plating system CP-1a. The reference condition number and permit date are changed to the current permit date.

Condition VI.A.4. This condition states the emission limits for the plating systems CP-1b and CP-2. The reference condition number and permit date are changed to the current permit date.

Condition VI.A.5. This condition states the requirement to comply with Subpart N. Also, the reference condition number and permit date are changed to the current permit date.

Conditions VI.A.6 and 7. The reference condition number and permit date are changed to the current permit date.

Monitoring, Recordkeeping, Testing, and Reporting

Conditions B.1., 2, 3, 4., 5., C. D., and E. The reference condition number and permit date are changed to the current permit date.

VIII. Facility Wide Conditions

Condition VIII.A.3. has been added. This requires a Startup, Shutdown, Malfunction Plan per 40 CFR 63.6(e)(3).

GENERAL CONDITIONS

The General Conditions have been adjusted to comply with the current boilerplate.

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

Public participation is not required for the proposed minor permit modification, per 9 VAC 5-80-210 D.